

Judge



04-CR-00334-M

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

KYLE GIANIS,

Defendant

NO. CR04-334JCC

GOVERNMENT'S MOTION  
FOR COMPULSION ORDER

The United States of America, by and through Jeffrey C. Sullivan, United States Attorney for the Western District of Washington, and Helen J. Brunner, Assistant United States Attorney for said District, moves that the Court issue an order pursuant to the provisions of Title 18, United States Code, Section 6001, et seq., compelling Adam Tsoukalas to give testimony or provide other information, which he refuses to give or provide on the basis of his privilege against self-incrimination, as to all matters about which he may be questioned in the above-captioned case, and respectfully alleges as follows:

1. Adam Tsoukals has been called to testify or provide other information in a deposition in connection with the above-referenced case.

2. In the judgment of the undersigned, the testimony or other information from this witness may be necessary to the public interest.

1       3.     The witness has refused to testify or provide other information on the basis  
2 of privilege against self-incrimination.

3       4.     This application is made with the approval of Jack Keeny, Deputy Assistant  
4 Attorney General in charge of the Criminal Division of the Department of Justice,  
5 pursuant to the authority vested in him by Title 18, United States Code, Section 6003, and  
6 28 C.F.R. § 0.175. Because of the press of time, the approval for this application was  
7 obtained by telephone with the formal letter to be sent later. Mr. Keeny provided the  
8 authorization to the undersigned counsel for the United States by telephone at 12:15 p.m.  
9 today.

10       DATED this 14th day of May, 2008.

11                               Respectfully submitted,

12                               JEFFREY C. SULLIVAN  
13                               United States Attorney

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15                               HELEN J. BRUNNER  
16                               Assistant United States Attorney  
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